

Tuesday, June 28, 2011

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street W. Washington, DC 20054

Re: CG Docket 03-123/10-51

Dear Mrs. Dortch,

By this notice, I request in concentration that FCC will enforce new rules on VRS for better service to the deaf community. myVRS Relay Central LLC concerns this new proposed for FCC to be reviews as follows:

- 1. All VRS Providers interpreters shall continue the phone call until completes. The transfer to other interpreter during live call has been abusive repeatedly, it needs to be stopped. A good reason needs to be given and must ask customer for permission before transfer to other interpreter during a live call.
- 2. The interpreter shall not have conversation with other interpreter via computer during live call. There is no luxury time to have this feature. This is not fair for the customers. There was numerous of customer complaints about this issue.
- 3. All VRS Providers are required to re-train all interpreters to ensure that they are certified and understand how to handle phone calls for the deaf people. 80% of the time, SorensonVRS has the highest complaints of unprofessional service.
- 4. The interpreter needs to be aware that the customer is in the control during a live phone call which including what customers want to do (ie: redial, on hold, transfer to other interpreter or hang up) and interpreter cannot deny any request at all.
- 5. White Label Providers who filed for the VRS certification between 2007 to 2009 shall be approved, and all others who filed after 2009 shall be denied for certification in October 2011. By having too many VRS providers in the market which caused VRS abuse due to Viable that happened in 2009. All VRS Providers directory listing is available on our website (www.myvrs.org) and recently, there is more than 40 VRS Providers offering VRS service to the deaf community.
- 6. Current white label providers shall have live customer service via videophone during business hours rather than only via email. The provider shall have help desk with all questions/answers available to customers 24 hours a day, 7 days a week.

- 7. The VRS payouts shall change to 60 days from current 45 days time frame to ensure that all VRS calls are legitimate. The fraud calls are still ongoing and never being get caught and wasting tax-payers dollars at risk.
- 8. All VRS Providers shall be required to provide mobile software with existing 10 digit phone number and have accessibility to download the software on their own without installer present.
- 9. The VRS rates shall change to a lower rate. Tier I shall be \$5.75, Tier II shall be \$5.25 and Tier III shall be \$4.50 per minute to reduce VRS abuse.
- 10. All VRS Providers shall provide 5 important tool to deaf customers in regarding VRS services are Quality Services, Fast Connection, Equality, Innovation and Future.

 These are the key values that will bring success to the VRS Providers for the next 21st century.

Progress toward functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available. VRS is a recent and dramatic advancement that benefits those who are deaf, but so much more can be done. It would be tragic if the FCC were to destroy or ignore the customers concern about Video Relay Service.

Very Truly yours,

Joseph Brzezowski

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